UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 3:10-CR-182
)	
MICHAEL T. RAND,)	
)	
Defendant.)	

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Michael T. Rand respectfully requests that the Court modify his conditions of release to permit him to travel to Ames, Iowa from May 28, 2014 through June 1, 2014 to accompany his son to an educational program and competition. In support of this request, Mr. Rand shows as follows.

Mr. Rand's son is thirteen years old and resides primarily at the home of Mr. Rand's former wife, Alison Rand, in Atlanta, Georgia. Mr. Rand's son participates in an educational program called Odyssey of the Mind, which hosts teams of students in problem-solving competitions. This year, he has qualified for the Odyssey of the Mind World Finals at Iowa State University in Ames, Iowa. The competition is scheduled to begin on May 28, 2014 and to conclude on May 31, 2014.

Mr. Rand seeks permission to travel with his son from Atlanta, Georgia to Ames, Iowa on May 28, 2014, to chaperone him and to support him during this competition.

Ms. Rand would remain in Atlanta with the Rands' thirteen-year-old daughter while Mr.

Rand and their son attend the competition. Mr. Rand and his son would return to Atlanta

no later than June 1, 2014, once the competition has concluded. Both the government and Mr. Rand's probation officer take no position on this request.

For the foregoing reasons, Mr. Rand respectfully requests that the conditions of his release be modified to permit him to travel to Ames, Iowa from May 28, 2014 through June 1, 2014 to accompany his son to this competition.

Respectfully submitted this 8th day of May, 2014.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the within and foregoing DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the attorneys of record.

This 8th day of May, 2014.

s/Brent J. Gurney

Brent J. Gurney DC Bar No. 408377

 $Counsel \ for \ Defendant \ Michael \ T. \ Rand$

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IN THE DISTRICT COURT OF THE UNITED STATES FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION 3:10-CR-182

UNITED STATES OF AMERICA)
vs.) ORDER
MICHAEL T. RAND) [PROPOSED]))
THIS MATTER is before the Court	upon defendant's Motion to Modify
Conditions of Release (Doc. No). For the	the reasons set forth in defendant's Motion,
the Court finds that the requested modificati	ons to defendant's conditions of release are
warranted.	
IT IS, THEREFORE, ORDERED,	that defendant's motion (Doc. No) is
GRANTED, and the defendant's conditions	of release are modified to permit him to
travel to Ames, Iowa from May 28, 2014 thi	rough June 1, 2014 to accompany his son to
an educational program and competition.	
	Signed:
	Robert J. Conrad, Jr. United States District Judge